

Members of my family are hearing, hard of hearing, and deaf. We are avid fans of television for news, information, education, and entertainment. All of our television sets display captions all the time.

Captioning problems exist and need to be addressed. I applaud the NAD, TDI, SHHH, DHHCAN, and ALDA for bringing this important issue to the attention of the FCC. I applaud the FCC for taking this action to seek comments from the television industry, captioners, and consumers.

As captioning consumers, we are excluded from enjoying programs that do not have captions. There are many of them. They are especially noticeable on local cable stations and on channels that show old movies. We are especially frustrated when we expect a program to be captioned and it is not. For example, "Trading Spaces" is captioned most of the time, but not consistently. Most movies are captioned, but some fairly recent releases are not shown with captions. When a program is not captioned, we cannot and do not watch it.

Captioning problems are significantly underreported by consumers.

Because most programs are captioned, and 100% captioning is not yet required, I do not bother to report or complain when a program is not captioned. When 100% captioning is virtually required next year, and a day time or prime time program is not captioned, I will have more confidence that my report might fix the problem or that my complaint is justified.

When I want to notify someone that the captions are missing, misaligned with the audio, or garbled, I am not sure who to contact. Should I contact the local broadcast station, the network, the channel provider, or the cable company? Is this a problem I want to be fixed so I can watch the program now? Or is this something I want to report so it won't happen again on tomorrow's or next week's episode? Who has the best chance to fix the problem immediately or at some time in the near future? Who should I contact (by phone) when I think an immediate response may

be possible? Who should I contact (by e-mail) when I want to report a particularly annoying or persistent problem? I do not want to write a letter and wait 45 days to get a response. Reporting captioning problems should be easy.

Because I can hear much of what is said, I can see when the captions don't match. On pre-recorded programs, occasionally a word or phrase will be different; almost as if the actors deviated from the script that was provided to the captioner. This inconsistency is only mildly annoying. When the captions do not align with the audio at all, and this happens occasionally, the program cannot be watched. On live programs, I can see when the captioner is transcribing phonetically, when corrections are made (thank you), and when words or whole sentences are missed. It is extraordinarily frustrating when captions are so poorly produced for live programs that meaning cannot be gleaned because of misspellings and missing words. That is not what I call captioning.

It is also annoying when captions are delayed and don't keep up with the visual portion of the program, when captions disappear just before the switch to the local station, when captions don't appear on the local station's segment, and when captions block text information, crawls, English subtitles, or the speaker's identity.

Everything should be captioned, including commercials and program announcements. I was quite surprised when I saw Presidents Clinton and Bush soliciting donations following Katrina in an advertisement that was not captioned.

Programs that are not captioned or poorly captioned and the advertisers that support them need to understand that their message is clear . . . you don't value me. My response cannot be unexpected . . . I change the channel.

For a program to be considered "captioned," the captioning must not only be present, it must meet minimum captioning standards for completeness, accuracy, readability, and timing with the audio

portion of the program. Extremely high standards must be set for pre-recorded programs. The vast majority of pre-recorded programs meet or are capable of meeting a near perfect captioning standard. Extremely high standards must be set for live programs, but this standard can be less than that required for pre-recorded programs. Setting standards is a step towards establishing some measure of accountability for caption production and transmission. Accountability will foster improvements in quality.

Establishing captioning standards will not deter or undermine the production of pre-recorded or live programming. They will not delay the airing of emergency announcements either because emergency announcements can be produced with alternative visual information if necessary. Establishing captioning standards will ensure that the intended goal of providing access through captioning is actually achieved.

TV broadcasters must monitor their programs, to account for the presence and quality of the captioning and to ensure that technical problems are remedied promptly and efficiently. TV broadcasters could enlist the support of captioning consumers in their monitoring efforts by making the process of reporting problems as easy as possible. Holding TV broadcasters accountable will ensure that they address technical problems and relay other captioning problems to the appropriate program provider and/or caption provider.

Thank you for this opportunity to provide comments about captioning.